IN THE UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF ALABAMA **EASTERN DIVISION**

| LORI ANN MORRIS, | } |
|---|-------------------------------|
| Plaintiff, | } |
| vs. | } CIVIL ACTION NO.3:05cv962-T |
| FLORIDA TRANSFORMER, EDWARD NEAL THOMPSON, et al., | } } } |
| Defendants. | } |

DEFENDANTS' RESPONSES TO DEPOSITIONS

COME NOW the Defendants, identified in the Complaint as Edward Neal Thompson ("Thompson") and Florida Transformer, Inc. ("FTI") (collectively referred to as "Defendants"), and hereby submit as their list of deposition testimony responsive to deposition testimony that might be offered by the Plaintiff, if such testimony is allowed and deemed admissible by the Trial Court, as follows:

1. Excerpts from the deposition of Edward L. Robinson: 14/11-14/16; 17/1-17/14; 18/8-18/17; 19/4-19/10; 19/23-20/5; 20/6-20/10; 30/2-31/3; 32/1-33/4; 34/13-35/19; 49/5- 49/18, 51/2-51/11; 60/13- 62/12; 62/13-63/11; 63/22-64/6; 66/11-66/20; 67/20-68/11; 72/6-72/19; 85/6-88/11; 114/18-115/1; 117/12-117/17; 134/14-134/23; 137/3-137/11; 144/3-144/5; 153/6-153/3; 154/2-156/10; 170/6-171/2; 172/16-173/17; 175/15-176/2; 178/20-179/1; 202/3-203/19; 204/13-205/4; 206/12-207/5; 208/1-208/9; 212/15-212/19; 215/18-216/8; 217/17-218/15; 228/3-228/14, 231/4-231/23; 247/22-248/5; 252/3-252/12.

2. Excerpts from the deposition of Andre LeBleu: 22/20-23/1; 24/23-25/3; 26/11-26/17; 31/1-15; 31/21-32/5; 32/12-33/4; 33/15-33/21; 34/8-34/13; 38/13-38/19; 39/18-41/10; 41/19-42/2; 42/16-43/1; 43/25-44/3; 49/2-50/2; 56/10-56/15; 56/24-57/3; 63/9-64/7; 68/13-74/6; 80/21-81/24; 83/24-84/10; 89/15-90/24; 91/9-93/7; 99/6-99/20; 101/21-101/25; 102/5-102/10; 102/16-102/21; 105/5-107/1; 111/13-111/22; 112/23-113/25; 115/2-115/11; 116/12-117/11; 122/19-122/24; 124/1-131/4; 129/5-130/13; 134/5-134/15; 134/21-134/22; 160/1-160/11.

Respectfully submitted,

/s/ Richard E. Broughton Richard E. Broughton

/s/ W. Evans Brittain W. Evans Brittain

Attorneys for Edward Neal Thompson and Florida Transformer

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that on this September 20, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Henry Lee Penickhlpenick@bham.rr.com hlpenick@penickandassoc.com

Manual Notice List

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> /s/ Richard E. Broughton OF COUNSEL